

1 Abran E. Vigil  
Nevada Bar No. 7548  
2 Sylvia O. Semper  
Nevada Bar No. 12863  
3 Matthew D. Lamb  
Nevada Bar No. 12991  
4 BALLARD SPAHR LLP  
100 North City Parkway, Suite 1750  
5 Las Vegas, Nevada 89106  
Telephone: (702) 471-7000  
6 Facsimile: (702) 471-7070  
vigila@ballardspahr.com  
7 sempers@ballardspahr.com  
lambm@ballardspahr.com  
8 *Attorneys for JPMorgan Chase Bank, N.A.*  
*And Federal National Mortgage Association*  
9

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 LN MANAGEMENT, LLC SERIES 5664  
DIVOT,

13 Plaintiff,

14 vs.

15 KIT DANSKER and JPMORGAN  
16 CHASE BANK, N.A.,

17 Defendants,

18 And

19 FEDERAL NATIONAL MORTGAGE  
ASSOCIATION and FEDERAL  
20 HOUSING FINANCE AGENCY,

21 Intervenors.

22 JPMORGAN CHASE BANK, N.A.,  
FEDERAL NATIONAL MORTGAGE  
23 ASSOCIATION and FEDERAL  
24 HOUSING FINANCE AGENCY,

25 Counter-claimant,

26 vs.

27 LN MANAGEMENT, LLC SERIES 5664  
DIVOT, LOS PRADOS COMMUNITY  
28 ASSOCIATION, INC.

Counter-Defendant.

Case No. 2:13-cv-01420-RCJ-GWF

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO SUBMIT  
JOINT DISCOVERY PLAN**

**(First Request)**

1 Plaintiff/Counter-defendant LN Management, LLC Series 5664 Divot, and  
2 Defendant/Counter-plaintiff JPMorgan Chase Bank, N.A. and Intervenors/Counter-  
3 plaintiffs Federal National Mortgage Association and Federal Housing Finance  
4 Agency (collectively “the parties”) by and through their counsel of record, hereby  
5 stipulate and agree as follows:

6 1. The parties request a 30-day enlargement of time to file their joint  
7 discovery plan and scheduling order to **Wednesday, July 15, 2015** for the following  
8 reasons:

9 a. On May 1, 2015, the parties filed a Stipulation to Entry of Order and  
10 Proposed Order Permitting Federal National Mortgage Association  
11 and Federal Housing Finance Agency to Intervene [Dkt No. 33], which  
12 this Court granted on May 14, 2015 [Dkt No. 35].

13 b. On June 12, 2015, Intervenors Federal National Mortgage Association  
14 and Federal Housing Finance Agency to Intervene filed their Answers  
15 to Complaint and Counterclaims against Plaintiff and Los Prados  
16 Community Association, Inc. [Dkt Nos. 36 and 37].

17 c. Counter-plaintiffs are in the process of serving counter-defendant Los  
18 Prados Community Association, Inc. with a copy of their  
19 counterclaims.

20 d. At this time, Los Prados Community Association, Inc. has not yet  
21 appeared in this matter.

22 2. Because an additional party is about to enter this case, the current  
23 parties believe it makes sense to enlarge time to submit a discovery plan and  
24 scheduling order.

25 3. This request is being made to allow time for all current and  
26 prospective parties to participate in the Fed. R. Civ. P. 26(f) conference and not for  
27 the purpose of delay.  
28

IT IS SO STIPULATED this 15<sup>th</sup> day of June, 2015.

<p>By: <u>/s/Kerry Faughnan</u>  Kerry P. Faughnan  PO Box 335361  North Las Vegas, NV 89033  Kerry.faughnan@gmail.com  <i>Attorney for Plaintiff</i></p>	<p>BALLARD SPAHR LLP</p> <p>By: <u>/s/ Abran Vigil</u>  Abran E. Vigil (SBN 7548)  Sylvia O. Semper (SBN 12863)  100 N. City Parkway, Suite 1750  Las Vegas, Nevada 89106  <i>Attorneys for Defendants</i>  <i>JPMorgan Chase Bank, N.A. and</i>  <i>Federal National Mortgage</i>  <i>Association</i></p>
<p>FENNEMORE CRAIG</p> <p>By: <u>/s/Leslie Bryan Hart</u>  Leslie Bryan Hart, Esq. (SBN4932)  John D. Tennert, Esq. (SBN 11728)  300 S. Second St., Suite 1510  Reno, Nevada 89501  <i>Attorneys for Intervenor Federal</i>  <i>Housing Financing Agency</i></p>	

IT IS SO ORDERED:



GEORGE FOLEY, JR.  
United States Magistrate Judge

Dated: June 17, 2015